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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE:

JOHN MICHAEL MULHERE, JR.,

DEBTOR

-----X

HEARING DATE: DECEMBER 11, 2019

HEARING TIME: 10:00 AM

CHAPTER 13

CASE No. 19-23720 (SHL)

**NOTICE OF THE DEBTOR'S MOTION FOR AN ORDER DIRECTING
THE WESTCHESTER COUNTY CLERK TO TURNOVER
PROPERTY OF THE ESTATE TO THE DEBTOR**

PLEASE TAKE NOTICE, that upon the annexed Motion of the debtor John Michael Mulhere, Jr. (the "Debtor") by his attorneys Cushner & Associates, P.C, dated November 27, 2019, the undersigned will move this Court before the Hon. Sean H. Lane, U.S. Bankruptcy Judge, at the U.S. Bankruptcy Courthouse, 300 Quarropas Street, White Plains, NY 10601 on **December 11, 2019 at 10:00 a.m.**, or as soon thereafter as counsel can be heard for an Order pursuant to Sections 105(a), 362(a), 541(a), 542, and 543 of the United States Bankruptcy Code directing the Westchester County Clerk to turn over the \$7,000.00 deposited by the Debtor with the Clerk of Court to the Debtor; and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, shall be served upon and received by counsel for the Debtor at the address indicated below and filed with the Court together with proof of service,

no later than SEVEN (7) days prior to the return date hereof.

Dated: White Plains, New York
November 27, 2019

Respectfully submitted,

By: /s/ Todd S. Cushner
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